Case 14-10652-amc Doc 48 Filed 07/21/16 Entered 07/21/16 16:34:36 Desc Main IN THE UNITED COMERTS IP AGE ROPETCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Danielle R. Harrigan	Debtor	CHAPTER 13
LOANDEPOT.COM, LLC	Movant	NO. 14.10652 AMG
vs. Danielle R. Harrigan	Debtor	NO. 14-10652 AMC
William C. Miller Esq.	Trustee	11 U.S.C. Section 362

STIPULATION

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

1. The post-petition arrearage on the mortgage held by Movant on Debtor's residence is \$5,712.35, which breaks down as follows;

Post-Petition Payments:

January 2016 through March 2016 at \$781.99 each

April 2016 through May 2016 at \$780.97 each

June 2016 at \$778.44

Fees & Costs Relating to Motion: \$1,026.00 **Total Post-Petition Arrears**

\$5,712.35

- 2. Debtor shall cure said arrearages in the following manner;
- a). Beginning July 2016 and continuing through December 2016, until the arrearages are cured, Debtor shall pay the present regular monthly payment of \$778.44 on the mortgage (or as adjusted pursuant to the terms of the mortgage) on or before the first (1st) day of each month (with late charges being assessed after the 15th of the month), plus an installment payment of \$952.06 towards the arrearages on or before the last day of each month at the address below;

Cenlar FSB 425 Phillips Blvd Ewing, NJ 08618

- b). Maintenance of current monthly mortgage payments to Movant thereafter.
- 3. Should debtor provide sufficient proof of payments (front & back copies of cancelled checks and/or money orders) made, but not credited, Movant shall adjust the account accordingly.

Case 14-10652-amc Doc 48 Filed 07/21/16 Entered 07/21/16 16:34:36 Desc Market 14. In the event the paragraph of the Paragre 24 of 2 are not tendered pursuant to the terms of this stipulation, Movant shall notify Debtor and Debtor's attorney of the default in writing and Debtors may cure said default within FIFTEEN (15) days of the date of said notice. If Debtor should fail to cure the default within fifteen (15) days, Movant may file a Certification of Default with the Court and the Court shall enter an Order granting Movant relief from the automatic stay.

- 5. The stay provided by Bankruptcy Rule 4001(a)(3) is waived.
- If the case is converted to Chapter 7, Movant shall file a Certification of Default with the court and the court shall enter an order granting Movant relief from the automatic stay.
- If the instant bankruptcy is terminated by either dismissal or discharge, this agreement shall be null and void, and is not binding upon the parties.
- 8. The provisions of this stipulation do not constitute a waiver by Movant of its right to seek reimbursement of any amounts not included in this stipulation, including fees and costs, due under the terms of the mortgage and applicable law.

By:

The parties agree that a facsimile signature shall be considered an original signature.

Date: July 5, 2016

/s/ Joshua I. Goldman Esquire

Joshua I. Goldman, Esquire Attorneys for Movant KML Law Group, P.C.

Main Number: (215) 627-1322

Date: 7/5/16

Brad J. Sadek Esq.

Attorney for Debtor

Approved by the Court this 21st day of July

, 2016. However, the court

retains discretion regarding entry of any further order.

Bankruptcy Judge Ashely M. Chan